EXHIBIT 6

IN THE UNITED STATES DISTRICT COURT

FOR THE WESTERN DISTRICT OF LOUISIANA 2 STATE OF ARIZONA et al 3 PLAINTIFFS, 4 CIVIL ACTION No. 6:22-cv-1130-Z v. 5 DISCLOSURE OF RODNEY SCOTT 6 GARLAND et al. 7 DEFENDANTS. 8 9 10 Plaintiff States disclose Rodney Scott pursuant to Fed. R. Civ. P. 26(a)(2)(C) as an expert 11 not retained or specially employed to provide expert testimony in this case. 12 1. Plaintiff States contemplate calling Mr. Scott to testify as a non-party regarding matters 13 related to immigration policy and the Asylum IFR, the impact of the Asylum IFR on migration and 14 States, and the consideration of those impacts (or lack thereof) in developing and issuing the 15 Asylum IFR. 16 2. Plaintiffs expect Mr. Scott to testify as to the facts and opinions summarized below: 17 a. The Biden Administration consistently focused on expediting processing and increasing 18 opportunities for migrants to enter the United States, and has acted to undermine border security. 19 b. The Biden Administration's immigration and border policies were developed and drafted 20 by political appointees. 21 c. The Biden Administration did not seek advice from or ignored advice from experts 22 regarding immigration and border policy, including with respect to the Asylum IFR. 23 d. Migration has exploded due to Biden Administration policies. Statistics released by the 24 Biden Administration downplay the level of migration and releases into the interior. 25 e. The southwest border is in crisis, that crisis is attributable to actions taken by the Biden 26 Administration, cartels effectively control who and what enters the United States, and the federal 27 government lacks operational control of the southwest border. 28 1

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1	f. The crisis and mass migration at the southwest border adversely impacts Plaintiff States	
2	g. Other testimony consistent with Mr. Scott's testimony before Congressional committees.	
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4	Detail: Santamban 25, 2022	D
5	Dated: September 25, 2023	Respectfully submitted,
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27	https://www.c-span.org/video/?528717-1/house-hearing-immigration-border-security https://www.c-span.org/video/?528250-1/hearing-biden-administrations-immigration-border-policies https://judiciary.house.gov/committee-activity/hearings/terrorist-entry-through-southwest-border	
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	4 P.T.W. ID. D.ED.O.D.T.	2